

United States Courts Southern
District of Texas
FILED

09/06/2023

Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States of America)
v.)
Alex SANTOS-Lopez (2002 / US)) Case No. 7:23-mj-1572
Jose Luis PACHECO (1999 / US))

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 6, 2023 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 554

Whoever fraudulently or knowingly exports or sends from the United States, or attempts to export or send from the United States, any merchandise, article, or object, to wit; 270 firearms and ammunition, as defined by the Commerce Control List, contrary to any law or regulation of the United States, in that the Defendants had not obtained a license or written authorization for such export, in violation of Title 50, United States Code, Section 4819(2), and Title 15, Code of Federal Regulations, Section 730 et seq., all in violation of Title 18, United States Code, Section 554.

This criminal complaint is based on these facts:

See ATTACHMENT A

✓ Continued on the attached sheet.

/s/ Elias J. Garza

Complainant's signature

Elias J. Garza, HSI SA

Printed name and title

Sworn to telephonically and signed electronically
per Fed.R.Cr.4.1

Date: 09/06/23 @ 10:10 p.m.

City and state: McAllen, Texas


Juan F. Alanis
Judge's signature

Juan F. Alanis, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

On September 6, 2023, U.S. Customs and Border Protection (CBP) Office of Field Operations at the Donna Port of Entry in Donna, Texas conducted an outbound inspection of a red GMC pickup truck that was attempting to exit the United States. Alex SANTOS-Lopez, (SANTOS) was identified as the driver of the vehicle and Jose Luis PACHECO (PACHECO) was identified as the passenger of the vehicle.

During the inspection of the truck and trailer, CBP Officers located 270 firearms and assorted ammunition concealed in the trailer behind a false wall and inside the two forty-five-gallon water heaters which were being hauled in the trailer. The firearms and ammunition are controlled items contained within the Commerce Control List.

Homeland Security Investigations (HSI) Special Agents responded to the Donna Port of Entry and interviewed SANTOS, who stated that he knew he was transporting firearms and admitted that he did not have a license to export the firearms out of the United States. SANTOS also stated that he and PACHECO had been planning this trip for approximately one month and that he was going to be paid \$5,000, which was going to be split evenly with PACHECO.

Neither SANTOS nor PACHECO had obtained a license to export the firearms and ammunition.